

IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE:	§	Chapter 11
	§	
JOHNSON BROADCASTING, INC. and	§	Case No. 08-36583
JOHNSON BROADCASTING OF DALLAS, INC.	§	
	§	Case No. 08-36585
	§	
Debtors.	§	Jointly Administered Under
	§	Case No. 08-36583

**MOTION OF MERRILL LYNCH COMMERCIAL FINANCE CORP., assignee of  
MERRILL LYNCH BUSINESS FINANCE SERVICES INC. TO PERMIT COUNSEL TO  
APPEAR TELEPHONICALLY AT THE APRIL 23 AND MAY 13, 2010 HEARINGS**

TO THE HONORABLE JEFF BOHM, UNITED STATES BANKRUPTCY JUDGE:

MERRILL LYNCH COMMERCIAL FINANCE CORP., assignee of MERRILL LYNCH BUSINESS FINANCE SERVICES INC. hereby files this *Motion of Merrill Lynch Commercial Finance Corp., assignee of Merrill Lynch Business Finance Services, Inc. to Permit Counsel to Appear Telephonically at the April 23 and May 13, 2010 Hearings* ("Motion") seeking entry of an order permitting counsel for MERRILL LYNCH COMMERCIAL FINANCE CORP., assignee of MERRILL LYNCH BUSINESS FINANCE SERVICES INC. to appear telephonically at the hearing set before this Court at 3:00 p.m. on April 23 and the hearing set before this Court at 9:30 a.m. on May 13, 2010. In support of the Motion, MERRILL LYNCH COMMERCIAL FINANCE CORP., assignee of MERRILL LYNCH BUSINESS FINANCE SERVICES INC. respectfully represents the following:

**JURISDICTION**

1. This Court has jurisdiction over the Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

**RELIEF REQUESTED**

2. MERRILL LYNCH COMMERCIAL FINANCE CORP., assignee of MERRILL LYNCH BUSINESS FINANCE SERVICES INC. requests to be appear telephonically for all matters addressed before this Court during the April 23 and May 13, 2010 hearings.

3. MERRILL LYNCH COMMERCIAL FINANCE CORP., assignee of MERRILL LYNCH BUSINESS FINANCE SERVICES INC. intends to appear at the hearing. Ms. Luttrell, counsel for

MERRILL LYNCH COMMERCIAL FINANCE CORP., assignee of MERRILL LYNCH BUSINESS FINANCE SERVICES INC., maintains her law office in San Antonio, Texas. In order to keep its fees and expenses to a minimum, MERRILL LYNCH COMMERCIAL FINANCE CORP., assignee of MERRILL LYNCH BUSINESS FINANCE SERVICES INC. respectfully requests that Leslie M. Luttrell of Davidson & Troilo, P.C. be permitted to appear telephonically at the hearings scheduled for 3:00 p.m., Thursday, April 23 and 9:30 a.m., Thursday, May 13, 2010.

WHEREFORE, MERRILL LYNCH COMMERCIAL FINANCE CORP., assignee of MERRILL LYNCH BUSINESS FINANCE SERVICES INC. respectfully requests that the Court (1) grant the Motion in its entirety; (2) permit Leslie M. Luttrell of Davidson & Troilo, P.C. to appear telephonically at the hearings; and (3) grant MERRILL LYNCH COMMERCIAL FINANCE CORP., assignee of MERRILL LYNCH BUSINESS FINANCE SERVICES INC. such other and further relief to which they may be justly entitled.

Dated this 20<sup>th</sup> day of April, 2010.

Respectfully submitted,

Leslie M. Luttrell  
Davidson & Troilo, P.C.  
Northwest Center  
7550 West IH-10, Suite 800  
San Antonio, Texas 78229-5815  
Tel: 210.349.6484  
Fax. 210.349.0041

By: /s/ Leslie M. Luttrell

Leslie M. Luttrell  
State Bar No. 12708650

ATTORNEYS FOR MERRILL LYNCH COMMERCIAL FINANCE CORP., assignee of MERRILL LYNCH BUSINESS FINANCE SERVICES INC.

**CERTIFICATE OF SERVICE**

I, Leslie M. Luttrell, do hereby certify that on the 20<sup>th</sup> day of April, 2010, I caused the foregoing document to be served electronically where available and by U.S. Mail, postage prepaid, and to the following :

**Debtor**

Johnson Broadcasting, Inc.  
8440 Westpark  
Houston, Texas 77063

**Attorney for Debtor**

John James Sparacino  
Timothy Alvin Davidson, II  
Andrews and Kurth  
600 Travis, Suite 4200  
Houston, Texas 77002

**U.S. Trustee**

Office of the US Trustee  
515 Rusk Avenue  
Suite 3516  
Houston, Texas 77002

Stephen Douglas Statham  
Office of the US Trustee  
515 Rusk Avenue  
Suite 3516  
Houston, Texas 77002

**Governmental Agencies:**

Internal Revenue Service  
Special Procedures Staff  
Insolvency Section, STOP 5022 HOU  
1919 Smith  
Houston, Texas 77002

Securities & Exchange Commission  
100 F Street, NE  
Washington, DC 20549

Internal Revenue Service  
P.O. Box 21126  
Philadelphia, PA 19114

**Twenty Largest Unsecured Creditors**

USFR Media Group  
Att: Greg Brown  
11150 Equity Drive  
Houston, Texas 77041

Warner Brothers  
Att: Legal Counsel  
4000 Warner Blvd., Bldg. 505  
Burbank, CA 91505

Edwards Koshiw Melton & Co.  
2155 Butterfield Road, Suite 305 A  
Troy, MI 48084

ASCAP  
21169 Network Place  
Chicago, IL 60673-1211

CBS Paramount  
P.O. Box 70642  
Chicago, IL 60673-0642  
KHO-TV  
1945 Allen Parkway

AT&T  
P.O. Box 930170  
Dallas, Texas 75393-0170  
Amgro, Inc.  
472 Lincoln Street

Houston, Texas 77019  
Andrews Kurth LLP  
600 Travis, Suite 4200  
Houston, Texas 77002

Worchester, MA 01615-0089  
Synergy Broadcast Group  
P.O. Box 230  
Wharton, Texas 77488

Smithwick & Belendiuk, P.C.  
5028 Wisconsin Avenue NW  
Suite 301  
Washington, DC 20016

Premium Finance Corporation  
9490 Almena Drive  
Kalamazoo, MI 49009

Bank of Amer Business Card  
P.O. Box 15710  
Wilimington, DE 19886-5710

Broadcast Music, Inc.  
P.O. Box 406785  
Atlanta, GA 30384-6785

Direct Energy  
75 Remittance Drive, Suite 6467  
Chicago, IL 60675-6467

City of Houston - Mech Sec  
P.O. Box 61167  
Houston, Texas 77208

Munn Reese, Inc.  
100 Airport Drive  
Coldwater, MI 49036

Reliant Energy HL&P  
P.O. Box 650475  
Dallas, Texas 75265-0475

Thales Broadcast & Media  
104 Feeding Hills Road  
Southwick, MA 01077

Pinnacle Towers, Inc.  
P.O. Box 409250  
Tampa, FL 33602-4352

Edwards Koshiew Melton & Co, P.C.  
2155 Butterfield Rd., Suite 305A  
Troy, MI 48084-3450

Time Warner Telecom  
P.O. Box 172567  
Denver, CO 80217-2567

TAB  
502 E 11<sup>th</sup> Street, Suite 200  
Austin, Texas 78701

#### **Notices of Appearance and Parties in Interest**

Kay Brock  
Assistant Attorney General  
Bankruptcy & Collections Division  
P.O. Box 12548  
Austin, Texas 78711-2548

Beth Alcantar  
8700 Waukegan Rd., Suite 100  
Morton Grove, IL 60053

Joan Kehlhof  
Charles Wist  
Wist Holland & Kehlhof  
720 North Post Oak Road, Suite 610  
Houston, Texas 77024

Daniel A. DeMarco  
Hahn Loeser & Parks LLP  
200 Public Square, Suite 2800  
Cleveland, OH 44114-2301

Kyle W. Johnson  
David Goodman & Madole, PC  
5420 LBJ Frwy, Suite 1200  
Dallas, Texas 75240

Michael P. Ridulfo  
Brown McCarroll, L.L.P.  
111 Bagby, 47<sup>th</sup> Floor  
Houston, Texas 77002-2543

IFC Credit Corp.  
8700 Waukegan Rd, Suite 100  
Morton Grove, IL 60053

TXU Electric  
P.O. Box 100001  
Dallas, Texas 75354-3301

Video Communications  
146 Chestnut Street  
Springfield, MA 01103

Broadcast Store  
500 W. 37<sup>th</sup> Street, 2<sup>nd</sup> Floor  
New York, NY 10018

AT&T  
P.O. Box 78225  
Phoenix, AZ 85062-8225

Devin Wickham  
P.O. Box 543301  
Dallas, Texas 75354-3301

Broadcast Music, Inc.  
10 Music Square East  
Nashville, TN 37203-4399

Challenge Office Products  
4400 S. Wayside  
Houston, Texas 77087

Thompson Broadcast & Multimedia  
104 Feeding Hills Road  
Southwick, MA 01077

National Assn of Broadcasters  
1771 N Street, NW  
P.O. Box 1474  
Washington, DC 20036

Verizon Wireless  
P.O. Box 920041  
Dallas, Texas 75392-0041

Ellis Heating  
536 N. Hwy 67  
Cedar Hills, Texas 75104

Fort Worth Regional Office  
Internal Revenue Service  
Rose L. Romero, Regional Director  
Burnett Plaza, Suite 1900  
801 Cherry Street, Unit 18  
Fort Worth, Texas 76102

David Elder  
Gardere Wynne Sewell LLP  
100 Louisiana, Suite 3400  
Houston, Texas 77002-5011

Mark W. Stout  
Padfield & Stout, L.L.P.  
777 Main Street, Suite 1920  
Fort Worth, Texas 76102

Kyle W. Johnson  
David Goodman & Madole  
5420 LBJ Freeway, Suite 1200  
Dallas, Texas 75240

Donald J. DeGabrielle, Jr.  
Wanda M. Cohen  
United States Attorney  
8701 S. Gessner, Suite 710  
Houston, Texas 77074

Michael P. Ridulfo  
Brown McCarroll, L.L.P.  
1111 Bagby, 47<sup>th</sup> Floor  
Houston, Texas 77002

Michael T. McGann  
Attorney at Law  
2211 Norfolk, Suite 400  
Houston, Texas 77098

Beth Alcantar on Behalf of  
Creditor IFC Credit Corp.  
8700 Waukegan Rd, Ste 100  
Morton Grove, IL. 60053

Daniel A. DeMarco on Behalf of  
Creditor Crown Castle USA, Inc  
200 Public Sq. Ste. 2800  
Cleveland, OH. 44114-2301

Frank Higney  
Kalil & Co., Inc.  
6363 North Swan Rd, Ste 200  
Tucson, AZ. 85718

Michael T. McGann on Behalf of  
Creditor Synergy Broadcast  
2211 Norfolk, Suite 610  
Houston, TX. 77098

TW Telecom, Inc.  
10475 Park Meadows Dr. #400  
Littleton, CO. 80124

John O. Noland  
79 W. Monroe Street  
Suite 823  
Chicago, Illinois 60603

Barbara M. Rogers  
Rogers Anderson & Bensey PLLC  
1415 North Loop West, Suite 1020  
Houston, Texas 77008

Dallas County  
Linebarger Goggan Blair & Sampson, LLP  
2323 Bryan Street, Suite 1600  
Dallas, TX. 75201

Fred Fellmeth on Behalf of  
Creditor Nucomm, Inc.  
101 Bilby Road  
Hackettstown, NJ. 07840

Andrew Unterlack on Behalf of  
Creditor Canon Financial Srv.  
121 Johnson Rd.  
Turnersville, NJ. 08012

Warner Bros Div / TimeWarner  
4000 Warner Blvd.  
Bldg 156, Rm 5158  
Burbank, CA. 91522

Marilee A. Madan, Esq.  
3109 Avalon Pl.  
Houston, Texas 77019

/s/ Leslie M. Luttrell

Leslie M. Luttrell